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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MERCY AMBAT, et al,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,

Defendants.

No. CV 07-03622 SI

(including No: C-08-2406 SI & C-09-2652 SI)

**STIPULATION FOR ORDER AND ORDER
REMOVING MATTER FROM TRIAL AND
FINAL PRETRIAL CONFERENCE CALENDAR
AND SETTING THE MATTER FOR CASE
MANAGEMENT CONFERENCE**

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel,
that:

- 1 (a) Plaintiffs and Defendant are currently set for Final Pretrial Conference in this court
- 2 on April 21, 2015, and for Jury Trial on April 27, 2015, on all of the claims
- 3 remaining in the Third Amended Complaint.
- 4 (b) The parties have prepared to go forward with trial. In addition, the parties spent April
- 5 2, 2015, in mediation with the Honorable James McBride (retired Judge of the
- 6 Superior Court).
- 7 (c) As a result of the mediation with Judge McBride, the parties have and do agree in
- 8 principle to settle and resolve all of their disputes.
- 9 (d) They are currently in the process of preparing the necessary documents to effectuate a
- 10 settlement including:
- 11 (1) submission of the Settlement Agreement and Release to the San Francisco
- 12 Board of Supervisors for approval, which may take up to 90 days;
- 13 (2) preparation of a Settlement Agreement and Release to be signed by all
- 14 plaintiffs, save and except possibly Plaintiff Anderson;
- 15 (3) in the event Plaintiff Anderson cannot be located, that her settlement be
- 16 confirmed as full, fair and appropriate compensation with authority from the
- 17 Court for her attorneys to dismiss her claim on funding;
- 18 (4) for the appointment of a Referee, the Honorable James McBride, to
- 19 recommend distribution of the settlement proceeds amongst the Plaintiffs,
- 20 with final distribution to be authorized by a hearing before this Court to take
- 21 objections to such distribution and issue the final order for distribution; and
- 22 (5) schedule the CMC with sufficient time for progress on funding, distribution
- 23 and settlement documents.
- 24 (e) The parties therefore respectfully request that the matter be removed from the Final
- 25 Pretrial Conference Calendar and the Jury Trial Calendar, and be placed on the Case
- 26 Management calendar 60 days from this date to review progress of the settlement.

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SO STIPULATED:

Date: April 3, 2015

MURRAY & ASSOCIATES

SAN FRANCISCO CITY ATTORNEY OFFICE

/s/ Lawrence D. Murray
Lawrence D. Murray
Attorney for Plaintiffs except Jon Gray

/s/ Jonathan Rolnick
Jonathan Rolnick
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/S/ Daniel H. Bromberg
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Attorneys for Plaintiff Jon Gray

ORDER ON STIPULATION FOR ORDER

HAVING READ AND CONSIDERED THE FOREGOING, and good cause appearing:

The foregoing is the order of the court. The new Case Management Conference Date is

August 7, 2015 at the hour of 3:00 p.m. in Courtroom 10.

Date: 4/3/15



SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE